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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AMERICAN CIVIL LIBERTIES UNION, :  
CENTER FOR CONSTITUTIONAL RIGHTS, :  
PHYSICIANS FOR HUMAN RIGHTS, :  
VETERANS FOR COMMON SENSE AND :  
VETERANS FOR PEACE, :  
:

Plaintiffs,

v.

DEPARTMENT OF DEFENSE, AND ITS :  
COMPONENTS DEPARTMENT OF ARMY, :  
DEPARTMENT OF NAVY, DEPARTMENT OF :  
AIR FORCE, DEFENSE INTELLIGENCE :  
AGENCY; DEPARTMENT OF HOMELAND :  
SECURITY; DEPARTMENT OF JUSTICE, AND :  
ITS COMPONENTS CIVIL RIGHTS DIVISION, :  
CRIMINAL DIVISION, OFFICE OF :  
INFORMATION AND PRIVACY, OFFICE OF :  
INTELLIGENCE POLICY AND REVIEW, :  
FEDERAL BUREAU OF INVESTIGATION; :  
DEPARTMENT OF STATE; AND CENTRAL :  
INTELLIGENCE AGENCY, :  
:

Defendants.

ECF CASE

No. 04 Civ. 4151 (AKH)

**NOTICE OF MOTION FOR  
PARTIAL RECONSIDERATION  
OR, ALTERNATIVELY, FOR  
PARTIAL RELIEF**

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PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law  
in Support of the Central Intelligence Agency's Motion for Partial Reconsideration or,  
Alternatively, Motion for Partial Relief, the accompanying Second Declaration of Marilyn A.

Dorn, dated February 16, 2005 and the previously-filed Declaration of Scott A. Koch, dated October 15, 2004, Defendant Central Intelligence Agency will move this Court on March 14, 2005, before the Honorable Alvin K. Hellerstein, United States District Judge, United States Courthouse, Room 14D, 500 Pearl Street, New York, New York 10007, for an order (i) granting partial reconsideration of the Court's February 5, 2005 Opinion and Order or, alternatively, granting the Central Intelligence Agency partial relief from the September 15, 2004 Order and (ii) modifying the Court's February 5, 2005 Opinion and Order.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Rule 6.1 of the Local Civil Rules of the United States District Court for the Southern District of New York, answering papers shall be served within ten business days after service of these moving papers, and reply papers shall be served within five business days after service of the answering papers.

Dated: New York, New York  
February 16, 2005

Respectfully submitted,

DAVID N. KELLEY  
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Intelligence Agency

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